

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>NO. 4:23-CR-159</b>
	:	
<b>CEDRIC LODGE, KATRINA</b>	:	<b>CHIEF JUDGE BRANN</b>
<b>MACLEAN, JOSHUA TAYLOR</b>	:	
<b>and DENISE LODGE</b>	:	
	:	
<b>Defendants.</b>	:	
	:	<b>ELECTRONICALLY FILED</b>

**AGREED MOTION TO CONTINUE PRETRIAL MOTIONS DEADLINE  
AND JURY SELECTION AND TRIAL**

Defendant Cedric Lodge, by and through his undersigned counsel, hereby moves to continue the pretrial motions deadline and jury selection and trial, and, in support thereof, avers as follows:

1. On June 16, 2023, a five-count Indictment was entered against Defendant Cedric Lodge. (ECF 1)
2. On June 16, 2023, the undersigned counsel entered their appearance on behalf of Cedric Lodge. (ECF 22)
3. On June 27, 2023, Cedric Lodge was arraigned, entered a plea of not guilty, and was released on his own recognizance. (ECF 31)

4. On June 28, 2024, the Court entered an Order scheduling trial for December 2, 2024, and ordering that pretrial motions be filed on or before November 1, 2024. (ECF 91.)

5. During a status conference call held by the Court on September 23, 2024, counsel for the defendants represented that an extension of the pretrial motions deadline is required for the following reasons:

- a) Defense counsel is in the process of negotiating the production of records recently subpoenaed from Harvard University Medical School.
- b) Defense counsel anticipates that the production of records from Harvard University Medical School will inform the defense regarding the merits of potential pretrial motions.
- c) Defense counsel requires additional time to review the current tranche of discovery.

6. Additionally, undersigned counsel and counsel for the Government is attached to *United States v. Dombek et. al.*, No. 3:23-CR-149-MEM, which is scheduled to start on October 28, 2024 and last for four weeks.

7. In light of the above, Defendant requests that the pre-trial motion deadline be continued for at least ninety (90) days to February 3, 2025, and the trial to be continued until April 2025.

8. Defense counsel avers that the ends of justice served by granting this continuance outweigh the interest of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

9. Further, failure to grant the instant request would deny Defendant competently prepared counsel and would result in a miscarriage of justice. *See* 18 U.S.C. §§ 3161(h)(7)(B)(i); 3161(h)(7)(B)(ii).

10. Counsel has sought the concurrence of Assistant U.S. Attorney Sean Camoni in this request. Mr. Camoni concurs in the motion.

11. Pursuant to Local Rule 7.5, no supporting brief is required because the reasons for the continuance are fully stated in the motion and the Government concurs in the relief requested.

WHEREFORE, Defendant Cedric Lodge respectfully requests that the pretrial motions deadline be continued for at least ninety (90) days to February 3, 2025 and that jury selection and trial to be continued until April 2025.

Respectfully submitted,

/s/ Patrick A. Casey

Patrick A. Casey

Attorney for Defendant, Cedric Lodge

Myers, Brier & Kelly, LLP  
425 Biden Street, Suite 200  
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(570) 342-6100

Date: September 27, 2024

**CERTIFICATE OF CONCURRENCE**

I, Patrick A. Casey, certify that I sought the concurrence of Assistant United States Attorney Sean Camoni in this Motion. Mr. Camoni concurs in this Motion.

/s/ Patrick A. Casey  
Patrick A. Casey

Date: September 27, 2024

**CERTIFICATE OF SERVICE**

I, Patrick A. Casey, hereby certify that a true and correct copy of the foregoing Agreed Motion to Continue the Pretrial Motions Deadline and Jury Selection and Trial was served upon the following counsel of record via the Court's ECF system on this 27<sup>th</sup> day of September 2024:

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/s/ Patrick A. Casey  
Patrick A. Casey